



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

ICR/CRH
F. #2015R01787

*271 Cadman Plaza East
Brooklyn, New York 11201*

January 25, 2019

By Email and ECF

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Re: United States v. Dan Zhong
Criminal Docket No. 16-614 (AMD)

Dear Counsel:

The government is producing the following materials:

- Pursuant to Rule 16, the government is producing photographs of Bank of China facilities located in Manhattan. (DZ069872-DZ069887).
- Pursuant to Rule 16, the government is producing United States Department of State visa records that have been designated "Sensitive Discovery Material" under the terms of the Protective Order dated February 22, 2017 (Dkt. No. 37). This production includes a re-production of more complete versions of visa records previously produced on January 24, 2019. (DZ069888-DZ069930).

The government renews its request for reciprocal discovery from the defendant.

Very truly yours,

RICHARD P. DONOGHUE
United States Attorney

By: /s/ Ian C. Richardson
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Enclosures (DZ069872-DZ069930)

cc: Clerk of the Court (AMD) (by ECF) (without enclosures)